

OZONE ACTION DAY PLAN 2017

I. INTRODUCTION

The U.S. Environmental Protection Agency (EPA) released a more stringent “health-based” air pollution standard on October 1, 2015, potentially impacting San Antonio’s air quality attainment status. Air quality is a significant priority for City Council, as it has an impact on our community’s public and economic health. The EPA updated its air quality standards for ground-level ozone to 70 ppb in response to a careful examination of thousands of studies showing that the 75 ppb standard set in 2008 was not protective enough of public health. A stricter standard means additional regulations for businesses that plan to expand or are potentially relocating to San Antonio.

The City of San Antonio has taken an active leadership role to implement pollution prevention measures year-round, especially during the Ozone Action Day (OAD) Season. The Ozone Action Day program targets specific days that may result in high ozone levels. The TCEQ notifies the community of an impending Ozone Action Day by 2 PM the day prior to an anticipated high ozone day in order to provide the community time to modify activities. Through outreach efforts, citizens are provided information on altering activities that reduce emissions and pollution and consequently lower ozone levels.

This *Ozone Action Day Plan* establishes guidelines and procedures for reducing emissions of ozone-forming compounds into the atmosphere, both on OAD as well as throughout the ozone season. City Departments, through voluntary compliance with the Ozone Action Day Program, will modify certain activities on OADs. This year will be the thirteenth year that the City has reviewed and implemented a plan to reduce ozone. All essential and emergency services remain unaffected. Since the implementation of the OAD Program, many Governmental Agencies, School Districts, and Industries have developed their own Ozone Action Day Plans. To date, over 300 plans were developed by the private industry, local Governments, school districts, and Clean Cities Coalition Stakeholders. These Agencies have voluntarily committed to reducing air pollution by submitting their plans to the Council of Governments for record.

II. BACKGROUND AND HISTORICAL INFORMATION

What is ground-level ozone? Ground-level ozone is the major component of smog and is not typically emitted directly from any source. Ozone is generally created in urban environments as a result of air pollution. Uncontrollable factors such as sunlight, high temperatures and low winds combine with controllable emissions to form ground-level ozone. These factors occur during the Ozone Action Season March 1-November 30. Emissions that contribute to ozone formation can be grouped into two basic classes: 1) volatile organic compounds (VOCs), such as fuels, solvents, paints, etc. and 2) oxides of nitrogen (NOX), which form as a by-product of combustion. Ground-level ozone can damage your health, aggravating allergies, asthma, and lung disease. Groups, such as children, field workers and the elderly, are most sensitive to increased levels of ground-level ozone.

The City believes that San Antonio can achieve clean air this ozone season if the entire community works together to reduce emissions, especially on Ozone Action Day. To date, the San Antonio region has implemented numerous voluntary emission reduction programs, including episodic and year-round programs, use of alternative fuels in local fleets, and

technical studies to characterize our situation. The two largest local sources contributing to ozone in San Antonio are: (1) area sources, such as residential and commercial painting, refueling activities, and construction sources; and (2) mobile sources including automobiles, trucks, etc. In order to improve air quality in San Antonio, reducing emissions from automobile engines is critical.

III. EMISSION REDUCTION MEASURES

Many City departments' operations consist predominantly of indoor duties. However, the use of City vehicles is sometimes required. Therefore, emission reduction measures are related to: (1) the use of alternative fuels in the entire City fleet; (2) reductions in emission from fueling activities; and (3) reductions in vehicle miles traveled, including trip reduction, car-pooling, rescheduling and encouraging use of public transit.

Refueling Plan

Gasoline pumps at Northeast, Northwest, Southeast, and Zarzamora Fleet Maintenance Service Centers, and the Patrol East, Patrol South, Patrol North, Police Headquarters Fueling Facility, Prue Road, Police Academy and the Airport are upgraded with vapor recovery systems. With this addition, vehicles will be allowed to refuel without restrictions during the ozone season. Vehicles refueling with diesel, propane or compressed natural gas are not to be restricted, nor will vehicles refueling at a service center retrofitted with Stage II VRS. All essential emergency service vehicles are allowed to refuel as needed.

IV. OZONE ACTION DAY NOTIFICATION PROCEDURE

To implement this Ozone Action Day plan and to monitor progress and compliance, each department Director has appointed one individual, Department Sustainability Liaison to ensure that all of the City's efforts are coordinated. The Government and Public Affairs Department through an all COSA user email will notify all employees when an ozone action day is announced by the Texas Commission on Environmental Quality. The Liaison is then responsible for ensuring all departmental personnel are notified. When an Ozone Action Day is called:

1. The TCEQ will notify the AACOG by 2:00 PM the day prior to the predicted event. AACOG administers a broadcast system to over 300 organizations in the San Antonio region notifying them of an upcoming OAD. The Health Department is the first point of contact at the City.
2. The Health Department will notify all City employees including each Liaison. Notification will be made by e-mail to all city employees. Alternative notification arrangements can be made for Liaisons who do not have regular access to the City email system. Employees will also be notified by an e-mail message sent to all COSA users from the Health Department. Department Liaisons are responsible for notifying their department and all employees who do not have access to e-mail. Employees are encouraged to respond to notifications received from TransGuide, local media, or other forms of communication.
3. Employees may contact the Health Department, at 207-2071, or the TCEQ hotline, at 1-800-64-TEXAS, if they need to confirm an ozone action day or are not receiving notification.

The individual Department Directors and liaisons will be responsible for the implementation of their departmental action plan. The Office of Sustainability will assist in insuring compliance by monitoring and providing recommendations to the Departments.

V. Department Sustainability Liaisons

DEPARTMENT	Liaison
Animal Care Services	Bethany Colonnese
Arts & Culture	Victoria S. Garcia
Aviation	Steven Southers/ Joshua Heiss
Building and Equipment Services	Sharron Harris
Center City Downtown Operations	Veronica Garcia
City Attorney	David Kurpgeweit
City Auditor	Doug Francis
City Clerk	Rosalinda Diaz
City Council Offices	Christopher Callanen
Convention Facilities	Wanda Williams
Development Services	James Flood/Angelica Davila
Economic Development	Hope Barrera
Finance	Theodore Sims
Fire/EMS	Michael Hinojosa
Government and Public Affairs	Eduardo Carrasco
Historic Preservation	Cory Edwards
Human Resources	Ana Bradshaw/Caitlin Buchanan
Human Services	Eric Teague
Innovation	Katherine Mason
Information Technology Services	Silvia McCollum
Library	Raymond Fraga
Management and Budget	To Be Determined
Municipal Court	To Be Determined
Parks and Recreation	Ryan Evans
Pre-K for SA	Sarah Perez
Planning and Community Development	Bobbie Hamilton
Police	Frank Garcia/Eloisa Diaz
San Antonio Metropolitan Health District	Mimmy Juarez
Solid Waste Management Department	Angelica Zuniga
Sustainability	Liza C. Meyer
Transportation & Capital Improvements	Jean Martinez
Tricentennial Office	Alyssa Esparza

VI. ADMINISTRATIVE DEPARTMENTS' PLAN

Because of the emission reductions resulting from the use of alternative fuels and the installation of vapor recovery systems at fueling facilities, the Ozone Action Day Plan was modified to provide more flexibility in vehicle operations. However, there are still some activities, such as the use of small gasoline-powered equipment that do not have catalytic converters, street paving, paint striping, and others, that remain prohibited on OAD. On OAD, all departments will implement the following:

- **Minimize scheduling of morning meetings between the hours of 8:00 a.m. and 9:00 a.m. when possible or teleconference.**

Because OAD are declared with only one-day notice, this practice of delaying meetings should be encouraged year-round.

- **Practice appropriate vehicle operating tips.**

For example, such as shutting off the engine when parked, avoiding excessive idling such as sitting at drive -thru's and leaving the vehicle running while parked. Operate the vehicle only on an as-needed basis to reduce emissions. Avoid travel through known congested areas whenever possible.

- **Consider your work schedule to reflect limiting vehicle and equipment use.**

Encourage multiple crew transports using higher occupancy rate vehicles.

- **Reschedule nonessential operations.**

For example, lawn maintenance, tree trimming, and use of power saws, generators, etc., which include other gasoline-powered equipment.

- **Reschedule nonessential outdoor painting activities and activities requiring solvent use.**

Postpone all solvent and paint use to evenings or on a non-Ozone Action Day.

- **Reschedule nonessential paving activities.**

Year-round, all departments will implement the following:

- 1) **Flextime:** Each Department will evaluate and implement their approved flextime policy with the purpose of minimizing congestion during peak traffic hours.
- 2) **Telecommuting:** Each Department will evaluate and implement a seasonal or year round telecommuting policy to minimize the overall number of vehicles traveling to and from City work areas.
- 3) **Service Contracts:** Department specific Ozone Action Day requirements will be incorporated into purchase and service contracts.
- 4) **Annual In-House Training:** Development of an annual training program to increase awareness of Ozone Action Day responsibilities of Departments and employees.
- 5) **Encourage use of public transportation and carpooling.** The City has a bus pass program and a carpool program for its employees. Call 207-1449 for more information on how to participate.
- 6) **Practice energy conservation** in City buildings, including but not limited to: turning off lights and computers and limiting air conditioning uses.
- 7) **Educational materials** on ozone action day and air quality in general are available to all employees and customers through the [Alamo Area Council of Governments](#). To request education materials or for staff assistance in presentations, please contact the Office of Sustainability at 207-1449.

- 8) Employees are encouraged to implement similar emission reduction measures at their homes.

Departments are directed to follow the plan as outlined above and to reschedule nonessential activities that result in emissions during OAD. Department Directors may modify this plan on a case by case basis if certain activities are essential to meet departmental goals. However, it is vital to our community that each City employee provides an example of what can and must be done to improve air quality.

VII. DEPARTMENT SPECIFIC PLANS

The following departments will implement department-specific OADPs, taking into account their specialized services and goals:

Note: Operations of these departments include the use of equipment that may result in significant air emissions. Specific plans are also included for departments which deliver health and public safety related services.

AVIATION

- Airport Rescue & Firefighting will reschedule or delete job tasks as follows:
 - All drills and equipment testing will be rescheduled to off-peak times.
 - Housekeeping duties which involve the use of motor vehicles or motorized equipment will be rescheduled, with the exception of tasks deemed essential to safety and security.
 - Parking shuttle buses will practice appropriate vehicle operating tips, such as shutting off the engine when parked and operating on an as-needed basis.
- Airport Maintenance will reschedule or delete job tasks as follows:
 - Except as required for compliance with Federal Aviation Regulations, mowing, trimming, and landscape activities which require the use of gasoline-powered engines will be altered to off-peak times or deleted for a cycle.
 - All exterior painting activities will be rescheduled.
 - Construction equipment and asphalt pavement placement will be scheduled for optimum air quality days.
 - Construction activities may take place during OADDs if deemed essential.
- HVAC will suspend Freon recovery operations during OADDs.
- Airport Police and Ground Transportation Agents will monitor curbside activities at the terminals for excessive idling of vehicles and assist with public advisories.
- Airport Operations will monitor conditions of vehicular use on the Air Operations Area of the Airport, as well as aircraft engine run-ups, and work closely with tenants to assist in control of excess emissions.
- All nonessential inspections that require vehicle use will be altered to off-peak times during OADDs.
- Airport Parking will ensure all lot entries are in operation to avoid lines of idling vehicles waiting for entry. Likewise, monitor exit lane traffic and staff exit booths accordingly, to avoid excessive lines of idling vehicles waiting to exit.

- No fuel transport will be accepted for off-loading on OADDs. All other off-loads of fuel will be limited to very early mornings or late evenings.
- Automotive shop vehicle engine test runs will be altered to off-peak times or rescheduled for a later date.

BUILDING AND EQUIPMENT SERVICES

- Idling of vehicles or equipment being repaired or serviced will be kept to an absolute minimum. Only public safety vehicles (Police & Fire) will be road tested.
- Meetings which require the movement of personnel by vehicle will be re-scheduled to begin not earlier than 10:00 a.m.
- Painting on vehicles or equipment will be strictly prohibited.
- Approved travel will be restricted to the essential justified service functions only.
- Idling of vehicles during approved travel must be kept to the absolute minimum. Under no circumstances will vehicles be left idling for the sole purpose of keeping the vehicle cool through use of the air conditioning system.
- The use of gasoline engine driven compressors to power pneumatic tools on service vehicles will be closely monitored by section supervisors. Except for tasks requiring impact wrenches, compressors will not be started.

CONVENTION FACILITIES

- The Convention Sports and Entertainment Facilities Department will modify or reschedule activities to assist in reducing the amount of VOC and NOx generated.
- Use of Convention Facilities' forklifts will be restricted to essential use only. As much as possible, all use will be rescheduled to non-OADDs.
- All gasoline powered equipment such as leaf blowers, pumps, etc., will not be utilized.
- Testing of the emergency generator will not be scheduled.
- All painting activities will be rescheduled.
- All contracted services that can be rescheduled to non-OADDs will be rescheduled.
- Notices will be provided to Convention Facilities Clients concerning OADD Measures and advising them on how to assist the City in reducing the amount of VOC and NOx generated emissions.
- The use of forklifts will be restricted to essential use only.
- Little to no use of vehicles and gasoline powered equipment. This will be rescheduled to non-OAD days or only as critical needs develop.
- All gasoline powered equipment such as leaf blowers, pumps, etc. will not be utilized.
- Testing of the emergency generator will be rescheduled to non-OAD days as needed.
- All painting activities will be rescheduled to non-OAD or with the exception of event days.
- Notice will be provided to Alamodome clients/tenants concerning OAD measures and advising them of recommendations to assist the City in reducing the amount of VOC and NOx generated.
- Battery powered ground equipment will be utilized on OAD.

- Equipment propane bottles will not be filled until after critical OAD hours or for essential use only.
- Boilers will be banked and ran for essential use during OAD.

DEVELOPMENT SERVICES

- On OAD, supervisors will have an appointed number of personnel to meet them at the different service centers for the purpose of car-pooling to work.
- Supervisory personnel will transport the mail from the different service centers.
- Overtime which requires use of vehicles will be limited, except for emergencies.
- There will be no sign pickup by the Sign Section.
- There will be no bus bench ad inspections.
- Modified (flex time) reporting times will be considered for employees using public transportation.

FINANCE

The Finance Department fully supports the City of San Antonio (COSA) Policy for curtailing emissions on designated Ozone Action Days and year-round. The department will implement the following procedures and guidelines:

- **Minimize scheduling of morning meetings between the hours of 8:00 a.m. and 9:00 a.m. when possible.**
- **Teleconferencing will be encouraged to avoid travel for meetings scheduled throughout the day.**
- **Practice appropriate vehicle operating tips:**
 - Shutting off the engine when parked
 - Avoid excessive idling such as sitting at drive-through windows and leaving the vehicle running while parked
 - Operate the vehicle only on an as-needed basis to reduce emissions
 - Avoid travel through known congested areas when possible
- **Encourage use of public transportation and carpooling.**

Employee Education Program

The department will implement an employee educational program with information disseminated via e-mail and bulletin board postings on the importance and benefits of reducing emissions during called Ozone Action Days along with year-round discussions.

Compliance and Monitoring Methodology

The department will hold group discussions in staff meetings regarding ozone action day measures in order to identify problems and identify solutions proactively.

FIRE

- Reduce the movement of nonpublic safety city vehicles, i.e., and reschedule deliveries.
- Field (tanker) refueling operations will be suspended.
- Reschedule bonfire permits.
- Reschedule control burning permits.

- Reschedule blasting permits.
- Reschedule indoor pyro and outdoor fireworks displays.
- Reschedule nonessential inspections on commercial establishments.
- Suspend starting the apparatus, engines, generators and PPVs at shift changes.
- Suspend hose practice and driving practice.
- Reschedule preventative maintenance.
- Suspend outdoor cooking.

METROPOLITAN HEALTH DISTRICT

- Outreach operations will be curtailed or deferred as much as possible, so long as the health of our clients is not compromised.
- Employees should remain in one location during the workday if possible.
- Encourage employees to bring a lunch or walk to a nearby restaurant.
- Vector Control operations will be complaint driven or substituted with in-service training.
- Reschedule nonessential operation using gasoline-powered equipment, such as lawn mowers, edgers, blowers, power saws, and tree trimmers.
- All employees are expected to comply with the provisions of this plan. Supervisors will be held accountable for the implementation of said plan.

PARKS & RECREATION

On OAD, the following operations will be suspended:

- Mowing and edging with 4-stroke cycle gasoline powered equipment with the exception of 2-stroke cycle equipment that uses a tier 2 engine.
- Spraying of insecticides and herbicides.
- Mixing, paving, and street patching in parks with hot asphalt concrete.
- Nonessential construction and heavy equipment use.
- Graffiti removal by spraying.
- Parking lot striping and sign painting by spraying.
- Non-essential 4-cycle mowing equipment or engines.

POLICE

Each Division ensures that all Units within the Division have an OADP that will be implemented upon notification of an OADD. Unit OADP's are formulated to the activities of each individual Unit.

Individual Unit OADP's should include items from the following:

- Fuel vehicles on day before OADD whenever possible.
- Reduce use of non-emergency vehicles.
- Restrict use of motor pool vehicles to essential use only.
- Avoid excessive idling of vehicles.

- Reschedule non-essential operations
- Enforce polluting vehicle ordinances or statutes.
- Encourage employees to car pool or use public transportation
- Encourage employees to avoid polluting activities at their home.
- Testing of the emergency generators will be rescheduled to non-OAD days as needed.
- Vendor grass cutting will be rescheduled on OAD days, no gasoline powered equipment such as Lawn equipment will be used.

PRE-K FOR SA

Standard Procedures: On OAD the following practices will be implemented:

- Telecommuting and teleconferencing to avoid travel for meetings among Centers
- Flex time to avoid peak travel hours at discretion of CEO
- Maintenance contractor will be notified on the day announcement is received
- Nurses will be notified to make decision if children with respiratory issues should stay inside
- Transportation contractor will be notified to avoid excessive idling

TRANSPORTATION & CAPITAL IMPROVEMENTS

On OADs, the following practices will be implemented:

- Reschedule nonessential operation using gasoline-powered equipment, such as lawn mowers, edgers, blowers, power saws, tree trimmers, and generators.
- Reschedule nonessential street striping and other painting activities
- Field (tanker) refueling operations will be suspended during OADDs.
- Reschedule nonessential graffiti removal activities.
- Reschedule nonessential construction.
- Crews will be reassigned to various manual tasks such as erecting signs, site cleanup, etc. when necessary.
- Operation of construction and heavy equipment will be restricted to essential use.
- In-house paving operations and mixing of hot asphalt concrete will be restricted to essential use.
- Personnel shall be assigned at the job site to limit travel.
- Spraying of insecticides will be suspended.

SOLID WASTE MANAGEMENT

On OADs, the following practices will be implemented:

- Reschedule nonessential operations using gasoline-powered equipment, such as lawn mowers, edgers, blowers, power saws, tree trimmers, and generators.
- Reschedule graffiti removal activities.
- Freon extraction shall be suspended.
- Reschedule nonessential construction.

- Operation of construction and heavy equipment will be restricted to essential use.
- Personnel shall be assigned at the job site to limit travel.
- Alternate work schedules will be implemented to allow supervisors to permit employees flex-time scheduling and telecommuting.
- Crews will be reassigned to various manual tasks such as erecting signs, site cleanup, etc.

TRICENTENNIAL OFFICE

The Tricentennial Commission Office fully supports the City of San Antonio (COSA) Policy for curtailing emissions on designated Ozone Action Days and year-round. Tricentennial Office will implement the following procedures and guidelines:

- **Minimize scheduling of morning meetings between the hours of 8:00 a.m. and 9:00 a.m. when possible or teleconference.**
- **Practice appropriate vehicle operating tips.**
 - For example, such as shutting off the engine when parked, avoiding excessive idling such as sitting at drive -thru's and leaving the vehicle running while parked. Operate the vehicle only on an as-needed basis to reduce emissions. Avoid travel through known congested areas whenever possible.
- **Encourage use of public transportation and carpooling.**
- **Flextime:** The Office will evaluate and implement approved flextime policy with the purpose of minimizing congestion during peak traffic hours.
- **Telecommuting:** Each Department will evaluate and implement a seasonal or year round telecommuting policy to minimize the overall number of vehicles traveling to and from City work areas.

Employee Education Program

Department staff will be updated via electronic mail, bin mail, or by other means as necessary on the importance and benefits of reducing emissions during called Ozone Action Days and year-round. Information received from COSA will be immediately forwarded to all department staff.

Compliance and Monitoring Methodology

Department will hold group discussions in staff meetings about flextime and/or other ozone action day measures to identify problems and find solutions early on.

VIII. EXISTING CITY OF SAN ANTONIO LONG-TERM ACTIONS TO REDUCE EMISSIONS

The City of San Antonio has implemented a number of programs to reduce adverse impacts of emissions on air quality. The following programs have the long-term benefit of providing a cleaner year-round operation while allowing for an enhanced level of service to the community.

Reformulated Diesel

Implemented voluntary introduction of a reformulated diesel for the City's and off-road diesel vehicles

Air Improvement Resources (AIR) Committee

The City of San Antonio in partnership with Bexar County, Alamo Area Council of Governments, and the Metropolitan Planning Organization coordinates policy, technical, and outreach issues for the San Antonio area.

Public Education and Outreach

Work with area governmental entities and local media to develop outreach programs

Fuel Facilities Upgrade

- Stage I Vapor Recovery Systems (VRS) are in place on the underground gasoline storage tanks at all City fueling facilities to enable recycling of fumes from the underground storage tank back to the tanker truck .
- Stage II VRS are in place on gasoline dispenser pumps at all nine eligible fueling facilities to allow for recovery of gasoline vapors from vehicle refueling. The vapors are recycled back to the underground storage tank.

Ozone Season Refueling Plan

The installation of Stage I and Stage II VRS, allows all vehicles, gasoline, diesel, and propane, to refuel at all facilities without restrictions.

Emissions Testing

BES implements a modified Inspection & Maintenance (I/M) Program using a four-gas emissions analyzer. All vehicles are tested by the I/M Program during the annual safety inspection. Any identified problems are corrected and the vehicle is re-tested.

Employee Bus Pass Program

To encourage employee bus ridership, the City participates in VIA's EZ Rider Program.

Flextime Policy

The City has implemented a flextime policy for all employees. Department Director's shall implement their individual flextime programs for their employees.

Traffic Signal Modernization/Synchronization (TSSM) Program

A five-year Traffic Signal System Modernization (TSSM) Program was established in 2007 to re-time the City's 1,300 traffic signals, scheduled to be complete in 2012. The goal was to enhance traffic efficiency on our existing roadways using existing infrastructure. At the completion of this program, all traffic signals will continue to be evaluated for needed timing adjustments annually.

Preservation of Trees

The City's Landscape and Tree Preservation Ordinance attempts to preserve existing trees, encourage the planting of new trees, and encourage responsible development. The City's Arborist can provide information on how trees are beneficial to air quality.

Green Building Policy

- Policy commits future City commercial-type buildings be designed and constructed according to economical and technically feasible high performance building concepts including: energy efficiency, green building guidelines.
- The basis of the Policy guidelines will utilize the standards and requirements of the Silver Level under the U.S. Green Building Council's LEED rating system

- The Office of Sustainability, in conjunction with the Development Services Department, obtained Council approval for advanced residential and commercial building codes. By ordinance the Stakeholder Sustainable Building Committee will meet every three years to review the City's energy conservation code and provide a recommendation to City Council.

Hybrid Taxi Ordinance

This program offers additional taxicab permits based on the implementation of hybrid vehicles for taxicab fleets. Failure to implement this change to the City Code will limit taxi companies to the operation of older internal combustion engine taxicabs without incentives to utilize more environmentally friendly hybrids.